

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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VW CREDIT, INC.,

Civil Action No. 25-cv-03953

Plaintiff,

- against -

GRAND AUTO GROUP LLC, ANDREAS  
STYLIANOU, CHARALAMBOS  
CHARALAMBOUS and  
LOUCAS IOANNOU,

Defendants.

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**STIPULATION AND ORDER TO EXTEND TEMPORARY RESTRAINING ORDER**

Plaintiff, VW Credit, Inc. (“VCI”), and Defendants, Grand Auto Group LLC (“Grand Auto”), Andreas Stylianou (“Stylianou”), Charalambos Charalambous (“Charalambous”) and Loucas Ioannou (“Ioannou”) (collectively, the “Defendants”), by and through their undersigned counsel, hereby stipulate to extend expiration of the Temporary Restraining Order entered on August 1, 2025 previously extended from August 15, 2025 to October 15, 2025 (collectively, the “TRO”) through and including December 5, 2025 and hereby stipulate as follows:

1. On July 18, 2025, VCI filed a Motion for Order to Show Cause for an Order of Seizure and for Temporary Restraining Order (“TRO Motion”) which was returnable on July 28, 2025. See ECF Doc. No. 7.

2. After a hearing before the Honorable Carol Bagley Amon, VCI’s TRO Motion was granted and on August 1, 2025, the TRO and Order of Seizure were entered. By its terms, the TRO was effective for fourteen (14) days from the date the Order was entered, or until August 15, 2025. By letter and stipulation dated August 14, 2025, the parties requested that the Court extend the

August 15, 2025 deadline to allow the Defendants to try to close on a sale if the dealership. See ECF Doc. No. 24. By Order dated August 14, 2025, the Court extended the August 15, 2025 deadline through and including October 15, 2025. See ECF Doc. No. 25.

3. VCI now requests, and Defendants consent to, an extension of the TRO on the terms set forth herein and therein to allow Defendants to complete the sale of Grand Auto. VCI is amenable to refraining from executing on the Order of Seizure so long as Defendants comply with the terms set forth in the TRO and the proposed buyers are making sufficient progress, in VCI's sole judgment and discretion, in obtaining purchase money financing from a lender and getting approval from Volkswagen Group of America as a franchised Volkswagen dealership. As of this date, VCI is willing to continue to refrain from exercising its rights under the Order of Seizure so long as the TRO remains in place and the proposed buyers continue to make sufficient progress towards obtaining purchase money financing and getting approved as a franchised Volkswagen dealership. Defendants agree that nothing herein shall be construed to restrict VCI from executing on the Order of Seizure if Defendants fail to comply with the TRO or the purchaser is not, in VCI's sole judgment and discretion, making sufficient progress towards obtaining purchase money financing and/or getting approved as a franchised Volkswagen dealership.

4. Pursuant to the TRO, VCI may request an extension of the TRO if necessary. See ECF Doc. No. 23; par. 3.

5. VCI and Defendants consent to extend the TRO for fifty-two (52) days, up to and including Friday, December 5, 2025. All terms of the existing TRO are fully incorporated herein.

WHEREFORE, the parties hereby jointly stipulate and respectfully move this Court to enter an Order extending the Temporary Restraining Order from October 15, 2025 up through and including December 5, 2025, and that all of the restraints set forth in the TRO are incorporated herein.

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**SO ORDERED:**

Dated: October 14, 2025

/s/ Honorable Carol Bagley Amon

Hon. Carol Bagley Amon  
United States District Court Judge  
Eastern District of New York